

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

UNITED STATES OF AMERICA

Case No. 1:22-cr-00112

Plaintiff,

v.

Hon. Robert J. Jonker

JERREIL LAMOUNTA MARTIN

Defendant(s).

**GOVERNMENT'S
INITIAL PRETRIAL CONFERENCE
SUMMARY STATEMENT**

I. DISCOVERY

A. Statements of Defendant

1. Oral Statements (Rule 16(a)(1)(A))

☐

There are no written records of oral statements or other oral statements as defined in Rule 16(a)(1)(A).

☒

There are the following written records of oral statements:

Statements made by Jerreil Martin to Kentwood Police on 02/16/2022, memorialized in Kentwood police reports.
Statements by by Jerreil Martin to ATF special agents on 08/19/22, memorialized in an ATF "ROI" report.

The substance of which

☐

has been disclosed to defense counsel.

☒

will be disclosed to defense counsel by August 26, 2022 .

2. Written or Recorded Statements (Rule 16(a)(1)(B))

☐

There are no written or recorded statements or grand jury testimony of defendant.

☒

There are the following written or recorded statements or grand jury testimony:

Statements made by Jerreil Martin to Kentwood Police on 02/16/2022, which was video and audio recorded.
Statements by by Jerreil Martin to ATF special agents on 08/19/22, which were audio recorded.

All written or recorded statements

☐

have been disclosed to defense counsel.

☒

will be disclosed to defense counsel by August 26, 2022 .

B. Defendant's Prior Record (Rule 16(a)(1)(D))

- ☒ The Government has made due inquiry and is not aware of any prior criminal record.
- ☐ The Government has disclosed defendant's prior criminal history.
- ☐ The Government is now making inquiry into defendant's prior criminal history. The results will be disclosed to defense counsel upon receipt.

C. Documents and Tangible Objects (Rule 16(a)(1)(E))

- ☐ The Government has no documents, tangible objects, or physical evidence required to be disclosed.
- ☒ The Government has the following documents, tangible objects, and physical evidence:
- ☐ Drug Paraphernalia ☐ Drug Records ☐ Inventory (attached)
- ☐ Controlled Substances: _____
- ☒ Records: Firearm store (FFL) sale records, ATF form 4473s, ATF reports
- ☐ Firearms: _____
- ☒ Other: Surveillance video footage, cell phone Cellebrite report/download
- ☐ The Government voluntarily notifies the defendant of the following search warrants issued and the warrant returns:
- ☐ State
- ☐ Federal:
- Case No. _____ Re: _____
- Case No. _____ Re: _____
- Case No. _____ Re: _____
- ☐ They have been made available for inspection and copying by defense counsel.
- ☒ Defense counsel should make arrangements with:
- AUSA Erin Lane

D. Reports of Examinations and Tests (Rule 16(a)(1)(F))

- ☒ The Government has no reports of examinations or tests required to be disclosed by Rule 16.
- ☐ The Government has or expects to have reports of the following examinations and tests:
- ☐ Drug Analysis ☐ Handwriting ☐ Fingerprints
- ☐ DNA ☐ Firearms/Nexus ☐ Gun Operability
- ☐ Computer Forensics ☐ Other: _____

E. Reciprocal Discovery

- ☒ The Government seeks reciprocal discovery.

F. Notice Under FRE 404(b)

☒ The Government does not presently intend to introduce 404(b) evidence.

☐ The Government does presently intend to introduce the following 404(b) evidence:

☒ The Government will provide pretrial notice of 404(b) evidence by 1 month before trial.

G. Other Discovery Matters

II. TRIAL

A. The Government requests a ☒ jury ☐ non-jury trial.

B. The length of trial excluding jury selection is estimated at 2 days.

III. MISCELLANEOUS

The parties acknowledge that if the case is appropriate for expedited resolution, a joint motion for expedited sentencing shall be filed within 14 days of arraignment.

☒ The Government is unaware at this time of any known conflict with defendant's representation by counsel. The United States will immediately advise counsel if any such conflict becomes known.

☐ The Government is aware of the following potential conflicts:

☒ Government's plea negotiation policy:

To benefit from concessions by the government, Defendant must enter into a plea agreement no later than one (1) week before the Final Pretrial Conference.

Date August 23, 2022

/s/Erin K. Lane
Counsel for the United States